

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

JUSTICE FOR THE NEXT GENERATION,
et al.,

Plaintiffs,

v.

TERRY JOHNSON, individually and in
his official capacity as Alamance County
Sheriff, *et al.*,

Defendants

Case No.: 1:20-CV-00998-CCE-LPA

DECLARATION OF ALLISON JOELLE HARVILL

I, Allison Joelle Harvill, pursuant to 28 U.S.C. § 1746, hereby declare as follows”

1. I am over eighteen years of age and make this declaration on personal knowledge. If called as a witness, I could and would testify competently to the matters set forth herein.
2. I am an attorney at Envisage Law. As part of my employment, I reviewed and analyzed discovery production in this lawsuit. As part of this analysis, I reviewed discovery production for responsiveness to production requests and for relevance. I also assisted with downloading Plaintiffs’ productions into our litigation discovery database.
3. I evaluated the various files Plaintiffs produced to ascertain the types of files and page numbers in Plaintiffs’ production. I compiled the chart attached hereto as Exhibit 1 based on my review of the files produced by the parties in this case.

4. As part of my review, I discovered that many of the video files produced by Plaintiff were duplicates of files produced earlier by Defendants.

5. Sixteen video files in Plaintiffs' second production were videos produced by the City of Graham Defendants in their first production on September 30, 2021. Those sixteen video files are part of the seventy video files that were duplicated from Plaintiffs' second production and reproduced in Plaintiffs' third production. This information is summarized in Exhibit 1.

6. As part of my analysis, I reviewed Plaintiffs' production for documents that Plaintiffs indicate originated from one of the Plaintiffs, such as communications. I excluded from my search criteria documents that originated with Defendants, such as policy manuals written by Alamance County or the City of Graham.

7. Plaintiffs' first production used the field "Custodians" to indicate from whom a document originated. Plaintiffs' second and third production used the field "Party" to indicate from whom a document originated.

8. My search yielded four documents produced by the Plaintiffs that originated from Plaintiffs. They are as follows:

- a. Letter dated October 8, 2020, from Rev. Gregory B. Drumwright to Chief Cole and the Graham Police Department sharing plans for "I Am Change March to the Polls," (hereinafter "Letter 1").
- b. Letter date October 26, 2020, from Rev. Drumwright to Chief Cole concerning meeting on Tuesday, October 20, 2020.
- c. Letter dated October 27, 2020, from Chief Cole to Rev. Drumwright in response to Letter 1 and meeting on Tuesday, October 20, 2020.

- d. Application for a Historic Courthouse Facility Reservation Permit dated October 10, 20, 2020, signed by Rev. Greg Drumwright.

As of the date of this declaration, my searching has not yielded any other documents originating with Plaintiffs.

I hereby declare under penalty of perjury that the foregoing Declaration is true and accurate base on my personal knowledge.

A handwritten signature in blue ink that reads "Allison Joelle Harvill".

Allison Joelle. Harvill

EXHIBIT 1

SUMMARY OF PRODUCTION BY PARTIES	
Plaintiff's Production 1	
107	Files
591	Pages*
15	Documents
4	Documents with Plaintiff listed as "Custodian"
56	Pictures
36	Videos
24GB	Size of File
Plaintiff's Production 2	
172	Files***
171	Pages
28	Pictures
144	Videos
61.8 GB	Size of File
Plaintiff's Production 3	
534	Files
534	Pages
456	Pictures
78	Videos
70	Videos previously produced in Plaintiff's 2 nd Production
16	Video of these videos were produced in the Graham Defendant's first production
64.5 GB	File Size
Graham's Production 9/30	
1987	Files
12935	Pages
795	Pictures
59	Videos
102.9GB	File Size
Grahams Production 11/2	
308	Files
1267	Pages
12	Pictures
0	Videos
308 MB	File Size

ACSO Production w/o Bates	
981	Files
1351	Pages
713	Pictures
150	Videos
40.34GB	File Size
ACSO Production w/ Bates	
565	Files
1073	Pages
284	Pictures
138	Videos
52.53GB	File Size

* Pages includes documents, video placeholders, pictures, screen shots of tweets.
** Plaintiff's production includes a file without a Bates number.